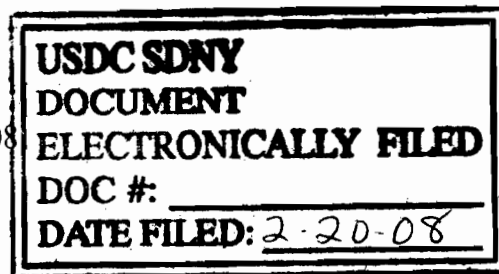


Federal Defenders OF NEW YORK, INC.

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Leonard F. Joy
Executive Director and
Attorney-in-Chief

February 19, 2008



MEMO ENDORSED

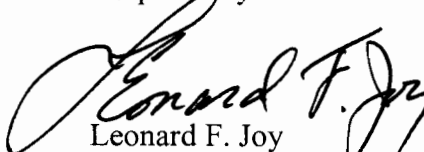
Honorable Leonard B. Sand
United States District Judge
Southern District of New York
United States Courthouse
500 Pearl Street, Rm. 1650
New York NY 10007

Re: United States v. Christopher Baez
07 Cr. 1158 (LBS)

Dear Judge Sand:

I anticipate that there will be a disposition of this case, but, if for some reason, there is not, I may move to suppress the items seized in a warrantless search of an apartment which the defendant shares with his girlfriend, Frances Estrella. The search was made following the defendant's arrest allegedly with the consent of Ms. Estrella. I have not had a chance to talk to either the defendant or Ms. Estrella about whether there are facts supporting a motion to suppress and to have Ms. Estrella execute an affirmation as to what such facts are. I, accordingly, request that I have an extension of the time to file such a motion until March 4, 2008, which is the date for our next pretrial conference. The government has advised me that it has no objection to this request.


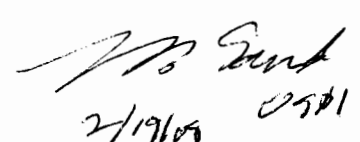
Respectfully,


Leonard F. Joy
Attorney-in-Chief
Tel.: (212) 417-8738

LFJ/ies

cc: Eugene E. Ingoglia, Esq.
Assistant United States Attorney

MEMO ENDORSED



2/19/08 0501